

# **EXHIBIT 1**

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

PALMAZ SCIENTIFIC, INC.  
Plaintiff

vs.

SUSAN E. HARRIMAN,  
Defendant

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Case No. 5-15-cv-00734-FB

**AFFIDAVIT OF SUSAN E. HARRIMAN**

STATE OF TEXAS

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§

COUNTY OF BEXAR

Personally appeared before me, an officer duly authorized to administer oaths, Susan E. Harriman, who deposes and says as follows:

1. “My name is Susan E. Harriman. I am over the age of 21, of sound mind and body, and I am capable of making this Affidavit. This Affidavit is based on my personal knowledge and the facts stated herein are true and correct.

2. I am a resident and citizen of the State of Texas. I reside on Lavaca Street in Austin, Texas. I have owned this property since 2013 and pay annual property taxes in Travis County, Texas for this property.

4. Attached as Exhibit A is a true and correct copy of my Texas Driver’s License. I have never had a driver’s license issued by the State of Colorado.

5. I am registered to vote in Texas and have been since 2004. Attached as Exhibit B is a summary of my Texas voter registration information including my voter identification number. I have never been registered to vote in the State of Colorado, and I have never voted in Colorado.

6. I am the owner of Plains America Capital Partners, LLC which is my business and

primary source of income. Plains America Capital Partners, LLC is formed under the laws of the State of Texas. Attached as Exhibit C is a true and correct copy of the Certificate of Formation, Limited Liability Company on file with the Texas Secretary of State's Office. It is still current with the Texas Secretary of State. Plaintiff attached a copy of this document with their filings in this case. I have never formed any business entity in Colorado at any time.

7. Plains America Capital Partners, LLC maintains its principal office at 10210 North Central Expressway, Suite 112, Dallas, Texas 75231.

8. I have several automobiles that are registered in the State of Texas and are insured in Texas. Attached as Exhibit D are true and correct copies of Texas Liability Insurance Cards for these vehicles.

9. My daughter Paige Harriman is a student at the University of Texas at Austin. Attached as Exhibit E are true and correct copies of the summaries of her Spring 2015 and Fall 2015 tuition bills that I have paid. The summaries show that the charges were for in-state tuition based on Texas residency, which is stated on the document.

10. In 2012, 2013 and 2014, I did stay at a Colorado vacation home in Evergreen, Colorado. I was still a permanent resident of Texas. The Colorado vacation house has recently been listed for sale and was for sale when this lawsuit was filed. I own no other property in the State of Colorado.

11. I have had an active financial account in Dallas for the last 10 years.

12. On my personal, federal income tax returns, I attach documentation from 2013 and 2014 establishing that my residency is in Texas. Exhibit F. Personal financial information has been redacted.

13. I have been summoned for jury duty in Texas. I have never been summoned for jury duty in Colorado. I have never paid state income taxes in Colorado.

14. In May, 2015, I was awarded the ACG-Dallas Dealmaker of the Year. See Exhibit G.

My Texas residency was verified to be eligible to receive this award.

15. It is my intention to continue to reside in Texas.

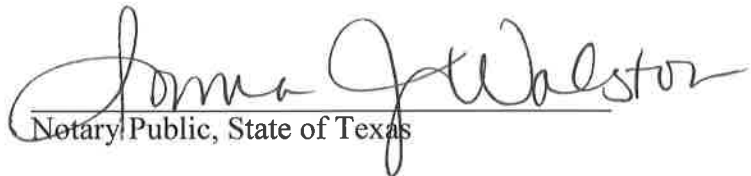
Further Affiant Sayeth Not.”

Signed on this day 10th day of September, 2015.

  
SUSAN E. HARRIMAN

SUBSCRIBED and SWORN TO BEFORE ME on this 10th day of September 2015, to certify  
which witness my hand and seal of office.



  
Notary Public, State of Texas